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12 FREESCALE SEMICONDUCTOR, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.
23
24

Civil Action No. 4:11-cv-05341 (YGR)

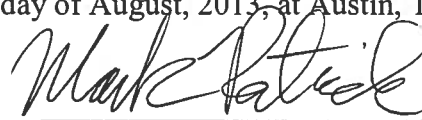
**DECLARATION OF MARK PATRICK
IN SUPPORT OF FREESCALE
SEMICONDUCTOR, INC.'S
STIUPLATED ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

1 I, Mark Patrick, declare as follows:

2 1. I am Law Director, Intellectual Property for Freescale Semiconductor, Inc.
3 (Freescale). I submit this declaration in support of Freescale's Stipulated Administration Motion
4 to File Documents Under Seal (Motion to Seal) pursuant to Local Rules 7-11 and 79-5. I have
5 personal knowledge of the facts set forth in this declaration and, if called to testify as a witness,
6 could and would do so competently.

7 2. **Document disclosing technical details for Freescale products.** Freescale seeks
8 to file under seal portions of Exhibit D1 to MediaTek Inc.'s (MediaTek) Expert Report of Charles
9 Narad Regarding Infringement of U.S. Patent No. 6,088,753 (Narad Expert Report). The portions
10 of Exhibit D1 that Freescale requests be sealed cite or discuss highly confidential proprietary
11 information on the technical details of Freescale's i.MX50 product family, an accused product in
12 this case. This proprietary information had been derived from confidential circuit diagrams that
13 Freescale stamped "Highly Confidential – Attorneys' Eyes Only" before producing them to
14 MediaTek. Disclosure of this information would significantly harm Freescale by allowing its
15 competitors to view detailed information on the design, structure, and operation of the i.MX50
16 product family, such that they may appropriate Freescale's proprietary technology. The requested
17 relief is necessary and narrowly tailored to protect the confidentiality of this information.
18 Accordingly, Freescale requests that the Court seal the portions of Exhibit D1 to the Narad Expert
19 Report that Freescale has proposed be redacted.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed this 27th day of August, 2013, at Austin, Texas.

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23 Mark Patrick
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